

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

VIRTAMOVE, CORP.,	§	
Plaintiff,	§	Case No. 2:24-cv-00093-JRG
	§	(Lead Case)

v.	§	
	§	
HEWLETT PACKARD ENTERPRISE	§	<b>JURY TRIAL DEMANDED</b>
COMPANY,	§	

Defendants.	§	
	§	
	§	

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VIRTAMOVE, CORP.,	§	
Plaintiff,	§	Case No. 2:24-cv-00064-JRG
	§	(Member Case)

v.	§	
	§	
INTERNATIONAL BUSINESS	§	<b>JURY TRIAL DEMANDED</b>
MACHINES CORP.,	§	

Defendants.	§	
	§	

**JOINT MOTION FOR EXTENSION OF TIME  
TO FILE PROPOSED DISCOVERY ORDER**

Plaintiff VirtaMove, Corp. (“Plaintiff”) and Defendants Hewlett Packard Enterprise Company (“HPE”) and International Business Machines Corp. (“IBM”) (collectively, the “Parties”) jointly move for a one-week extension of time to file their Proposed Discovery Order in the lead case.

The parties respectfully submit there is good cause for this request. The IBM case includes counterclaims against VirtaMove for patent infringement that are not at issue in the HPE case, and the parties request additional time to meet and confer to account for these differences in the Proposed Discovery Order.

The current deadline to file a Proposed Discovery Order is June 12, 2024. The requested extension would change this deadline to June 20, 2024, as the Court is closed on June 19, 2024 to observe a Federal Holiday. This extension is not sought for purposes of delay but so that the Parties can work toward reaching further agreement.

Counsel for the Parties have conferred and agreed to this extension. Accordingly, the Parties respectfully request that the Court grant this joint motion and enter the attached proposed Order.

Respectfully submitted,

/s/ Qi (Peter) Tong (w/ permission)

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*Attorneys for Defendant International  
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### **CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record are being served with a copy of this document via the Court's CM/ECF system on June 12, 2024.

/s/ Jennifer H. Doan

Jennifer H. Doan

### **CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that pursuant to Local Rule CV-7(h), counsel for Defendants conferred with counsel for Plaintiff. All parties agree to the filing of this joint motion.

/s/ Jennifer H. Doan

Jennifer H. Doan